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REMARKS

Reconsideration is respectfully requested in light of the foregoing Amendment and remarks that follow:

Claims 28 and 68 have been cancelled, in response to the Examiner's informality objection.

In response to the Examiner's objection to Claims 27, 46 and 47, the words "the then current dynamic public IP address" has been replaced with the words "**a then current dynamic public IP address**".

An objection has been made regarding claims 50 and 52, namely that such claims include the words "the then current dynamic public IP address". Agent for Applicant points out that claims 50 and 52 in fact do not contain these words. In an abundance of caution, Agent for Applicant has amended claims 50 and 52 such that it refers to "**a then current location of the personal computer**" rather than "the then current location of the personal computer".

25 U.S.C. Para. 103

Examiner rejected Claims 27, 29-67 and 69-73 under 35 U.S.C. 103(a) as being unpatentable over United States Patent No. 6,466,981 ("Levy") in view of United States Patent No. 6,614,774 ("Wang"). Fundamentally, Examiner posits that it would have been obvious to include the dynamic address assignment system of Wang in the communication facility of Levy, in order to enable the personal computer to communicate its current IP address to an access server and thereby enable communication between the remote laptop and the corporate desktop.

Agent for Applicant responds as follows:

As Examiner has previously stated, but for convenience, the claimed invention relates to the following subject matter. A particular solution is claimed (e.g. Claim 27, and each of the elements in this summary of the invention being taken from Claim 27) for enabling:

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(a) Access to a "personal computer" having either a "dynamic public IP address" (i.e. publicly addressable) or a "dynamic LAN IP address" (i.e. publicly un-addressable) from a "remote computer".

(b) It is important to note that the "personal computer" is already "linked to the Internet", and that the "remote computer" is also already "linked to the Internet".

(c) The problem, of course, of the "dynamic public IP address" and the "dynamic LAN IP address" in providing access to the "personal computer" from a remote location, is that because each of these IP addresses is dynamic and may or may not be publicly addressable, means needs to be provided, specifically a special technology to facilitate and/or initiate a communication session with the "personal computer". The prior art solutions (which need not be discussed at length for the purposes of this summary) employ solutions that are generally expensive, relatively complicated to install and/or to maintain, and in particular require a solution (particularly for addressing "dynamic LAN IP addresses") that is often less than desirable from a security perspective. More importantly, the prior art solution is unable to facilitate and/or initiate a communication session with the "personal computer" is a dynamic LAN IP address that is non-publicly addressable. The claimed invention relates to a particular and rather elegant solution for addressing this problem. This solution, particularly when introduced, was unique to the Applicant.

(d) The solution includes placement in the middle, between the "personal computer" and the "remote computer" of a "locator server computer". In other words, the locator server computer is operable to act as an intermediary between the "personal computer" and the "remote computer". The "locator server computer" itself has a static IP address. Also, the "personal computer" is provided with a "data communication facility" which from time to time sends "one or more communications to the locator server computer that include the then current dynamic public IP address or dynamic LAN IP address" of the "personal computer" as well as listening to any requests from the remote computer. In turn, when communication between the "personal computer" and the "remote computer" is requested, the "locator server computer" is "operable to act as an intermediary between the personal computer and the remote computer by creating one or more communication sessions" between the "personal computer" and the "remote

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computer" by the "location facility" essentially looking up the then current dynamic public IP address or dynamic LAN IP address that was previously provided. Consequently, the "locator server computer" is operable to "create a communication channel" between the "personal computer" and the "remote computer", whether the "personal computer" is associated with a "dynamic public IP address" or a "dynamic LAN IP address".

It is this solution that relies on the three-way architecture of the "personal computer", the "remote computer" and in between the "locator server computer" and the claimed interactions therebetween that is unique.

Levy

Levy is quite clearly concerned about configuring a laptop automatically to provide an Internet connection not previously configured on the laptop. Specifically, a user connects the laptop to an Ethernet connection (e.g. in a hotel). The laptop as a result of such connection executes a small access software application that directs the laptop to process an URL, which is broadcast over the Internet by an access server. The access software application directs the laptop to execute a browser. The browser is operable to process the URL so as to access a web page linked to the URL, provided by a communication server. The web page contains basic service information that enables the configuration of the Internet connection to be completed for the laptop. The invention is best illustrated in Fig. 2 of Levy. The interactions are illustrated in Fig. 5: the end result is the Internet connection of the laptop. The invention is best explained in Col. 2, line 28 to Col. 3, line 12, and also beginning at Col. 5, line 23 through to the end of Col. 9.

It should be understood that:

- Levy is concerned with the creation of an Internet connection at the laptop, which is one particular embodiment of the claimed "remote computer". This is clearly assumed in Applicant's invention, which is the point of underlining above that the "remote computer" is already claimed to be "linked to the Internet". Applicant is not interested in patenting a particular solution for configuring the "remote computer" to connect to the Internet, but rather locating the "personal computer" so as to permit a communication session to be established between the "personal

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computer" and the "remote computer", as specifically claimed. Levy, therefore does not constitute relevant art, and certainly does not render the claimed invention obvious in the hands of a person skilled in the art, whether by itself or in combination with any other reference, including Wang (discussed below).

- It should also be noted that the claimed invention does not include an "access software application" as described in Levy, nor does the claimed invention contain an "access server" and "communication server" as described in Levy, because the "access server" and "communication server" are quite specifically designed to enable the interactions described above in the summary of Levy, which again are completely different from the interactions in the claimed invention.

- It is also noted that the first paragraph of Col. 10 makes it quite clear that once the Internet connection has been set up as described in Levy, it is up to the user of the laptop to use some other technology to connect to the desktop (or "personal computer" – as per the claimed invention) such as a tunnelled connection (a VPN for example, it is supposed). In other words, this further underlines that Levy is concerned with establishing the Internet connection, and does not at all provide a solution for reaching the desktop once this connection is established, and in particular no solution is described that would address the issue of dynamic IP addresses, that is either publicly addressable or non-publicly addressable IP addresses.

- In summary therefore, Levy is inapplicable to the claimed invention, and the claimed invention is not obvious based on Levy, or in fact any other reference, or in combination with any other reference.

Wang

Wang relates to technology that enables the management (creation and assignment) of IP addresses in a mobile network. Specifically, the purpose of this management is to enable mobile users to roam off of a host network (different from a home network), by dynamically assigning to mobile devices a new IP address recognized by the host network. The invention deals specifically, for example, with the DNS based interactions as between the host network and home network for example to authenticate the mobile device prior to providing access to the host network, and to route calls to the mobile device once connected to the host network. This is extremely

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clear from Fig. 4 of Wang, as well as the detailed description Col. 6, line 12 through to Col. 9, line 23.

It should be understood that:

- The claimed invention assumes that a dynamic IP address has already been assigned to the "personal computer" (clearly set out in all Claims, including Claim 27). Technology that permits the management of such dynamic IP addresses is not part of the invention, and clearly is not part of the claims. DNS type technology that enables the assignment of IP addresses to mobile terminals to enable roaming on a host network, and interactions related to such IP addresses as between the host network and the home network is completely unrelated to the claimed invention. In other words, it is submitted with respect that Wang is completely unrelated art.
- Wang does not add anything of value to the subject matter of the patent application at issue.

Based on the above, the claimed invention is not anticipated or obvious, based on Levy or Wang, or the two in combination. A person skilled in the art of the claimed invention, having regard to the problem addressed by the patent application at issue would not have regard to Levy or Wang. Even if they did, the references separately or in combination do not provide assistance in addressing the problem.


Conclusion

In view of the foregoing amendments and remarks, it is submitted with respect that each and every one of the Claims is in condition for immediate allowance. Examiner is requested to contact the Agent for Applicant if Examiner is preparing to take any action other than issuance of a Notice of Allowance.

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Applicant requests an opportunity to submit any Supplemental Amendment that might advance prosecution and place the Application in allowable condition.

Yours faithfully,



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